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Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION

Chapter 11 (Lead Case) (Jointly Administered)

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead
Case, No. 19-30088 (DM)*

**RESERVATION OF RIGHTS OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS TO DEBTORS' SECOND
AMENDED MOTION FOR ENTRY OF ORDERS
(I) APPROVING TERMS OF, AND DEBTORS'
ENTRY INTO AND PERFORMANCE UNDER,
EQUITY BACKSTOP COMMITMENT
LETTERS, (II) APPROVING TERMS OF, AND
DEBTORS' ENTRY INTO AND
PERFORMANCE UNDER, DEBT FINANCING
COMMITMENT LETTERS AND (III)
AUTHORIZING INCURRENCE, PAYMENT
AND ALLOWANCE OF RELATED FEES
AND/OR PREMIUMS, INDEMNITIES, COSTS
AND EXPENSES AS ADMINISTRATIVE
EXPENSE CLAIMS [DKT NO. 6013]**

Date: March 16, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 The Official Committee of Tort Claimants (the “TCC”) of the above-captioned debtors
2 (collectively, the “Debtors”) hereby files this reservation of rights (“**Limited Objection**”) to the
3 *Debtors’ Second Amended Motion for Entry of Orders (i) Approving Terms of, and Debtors’ Entry*
4 *into and Performance Under, Equity Backstop Commitment Letters, (ii) Approving Terms of, and*
5 *Debtors’ Entry into and Performance Under, Debt Financing Commitment Letters and (iii)*
6 *Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums, Indemnities,*
7 *Costs and Expenses as Administrative Expense Claims* (the “Motion”) [Dkt. No. 6014] with respect
8 to arguments that may be presented to this Court at a hearing on the Motion, presently scheduled
9 for March 16, 2020, at 10:00 a.m., as the Motion outlines a capital structure that substantially differs
10 from the structure that was proposed at the time that the TCC entered into its RSA with the Debtors
11 and other parties. The TCC reserves the right to address arguments or issues addressed in the
12 Motion or raised at the hearing, or respond to issues that may be raised in written oppositions filed
13 in advance of the hearing.

14
15 Dated: March 12, 2020

BAKER & HOSTETLER LLP

By: /s/ David J. Richardson

Robert A. Julian

Cecily A. Dumas

David J. Richardson

*Counsel to the Official Committee of Tort
Claimants*